

LITE DEPALMA GREENBERG, LLC

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Liaison Counsel for Lead Plaintiff

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

_____)	
KAREN M. BAUER, Individually and on)	Civil Action No. 09-1120-JLL
Behalf of All Others Similarly Situated,)	
)	
Plaintiff,)	
vs.)	
)	
PRUDENTIAL FINANCIAL, INC., et al.)	
)	
Defendants.)	
_____)	

**MOTION FOR AWARD OF ATTORNEYS' FEES AND
REIMBURSEMENT OF COSTS AND EXPENSES**

PLEASE TAKE NOTICE that on November 14, 2011 at 10:30 a.m., pursuant to the Court's August 5, 2011 Order [Dkt. No. 116], Liaison and Lead Counsel for Plaintiff ("Class Counsel") will move before the Honorable Jose L. Linares, U.S.D.J., at the United States District Court, 50 Walnut Street, Newark, New Jersey 07102 for their application for an award of (a) attorneys' fees in the amount of twenty-five percent (25%) of the \$16,500,000 Settlement Fund, (b) reimbursement of costs and expenses in the amount of \$179,973.63, and (c) interest on those

attorneys' fees, costs and expenses at the same rate as earned by the Settlement Fund from the date that the Settlement Fund was established until paid to Class Counsel.

In support of this Motion, Class Counsel have submitted (i) the Declaration of Jeffrey S. Nobel, (ii) the Memorandum In Support Of Motion For Final Approval Of Class Action Settlement, Motion for an Award of Attorneys' Fees and Reimbursement of Expenses, and Motion for Award to Lead Plaintiff, and (iii) a [proposed] Order Awarding Attorneys' Fees and Reimbursement of Costs and Expenses (attached hereto as Exhibit A).

Dated: October 21, 2011

LITE DEPALMA GREENBERG, LLC

By: /s/ Joseph J. DePalma
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